

Site: Du Pont, ET
ID # MOD071991434
Break: 1.0
Other: 1/1-99

PRELIMINARY ASSESSMENT 2

E I DUPONT DE NEMOURS SITE
MOBERLY, MISSOURI
CERCLIS NO. MOD071991434

40214639



SUPERFUND RECORDS

Prepared for:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VII SUPERFUND SITE ASSESSMENT PROGRAM
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SUPERFUND TECHNICAL ASSESSMENT and RESPONSE TEAM
REGION 8
CONTRACT NO. 68-W5-0031
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Introduction

In March 1999, the Office of Inspector General (OIG) released an audit report entitled, "Superfund Sites Deferred to RCRA." The purpose of the OIG audit was to assess the status of potential hazardous waste sites, which the U. S. Environmental Protection Agency (EPA) Superfund Program had deferred to the Agency's Resource Conservation and Recovery Act (RCRA) Program for follow-up assessment and corrective action. The OIG audit concluded that a large portion of sites deferred to the RCRA program did not meet the appropriate deferral criteria. In addition, a number of deferred sites were not found in the RCRA Information System (RCRIS) database.

In response to the OIG audit findings, the Region 7 Superfund Program is conducting a comprehensive review of all RCRA-deferred sites. Tetra Tech EM Inc. (Tetra Tech) has prepared this Preliminary Assessment 2 (PA2) in order to document current site status and to provide the information needed for Superfund staff to revise the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Information System (CERCLIS).

This PA2 includes a brief physical description of the site; its history and operations; the final CERCLA determination, where applicable; the most recent information regarding site status; and recommendations for follow-up action including, if necessary, additional Superfund assessment.

CERCLA History

1. Site Discovery - 2/6/89
2. Preliminary Assessment (PA) - 3/31/92
3. Draft Hazard Ranking System (HRS) Score of 2.1 - 6/5/92
4. Environmental Priorities Initiative (EPI)/PA Report - 9/29/92
5. Final Strategy Determination - 9/30/92

Site Location and Description

The E. I. DuPont de Nemours (DuPont) site is located in the City of Moberly, Randolph County, Missouri, at the intersection of Route 24 and Robertson Road. The geographic location of the DuPont site is latitude 39°26'30" North and longitude 92°26'21" West. Prior to construction of the DuPont facility in 1968, the site was agricultural land which included pastures and a farmer's slaughter house. The DuPont site occupies about 46 acres in an industrial area north of the main business district of Moberly. The DuPont site consists of warehouses, process buildings, storage tank farms, and parking lots. These features are located within a fenced, restricted access area of the DuPont site. The site property located north of the fenced area is unpaved and vegetated by native grasses and plants.

Operational History and Waste Characteristics

DuPont began operations at the site in May 1969 and continued operations for 22 years. During its years of operation, the facility mixed raw materials to manufacture paint and packaged the product in cans. DuPont bought resins, solvents, and pigments which were pumped into 300-gallon tanks, mixed, pumped to filling machines, containerized, palletized, and shipped off site.

Wastes generated at the facility included those identified by the following waste codes: K054, D001, D002, D007, D008, F003, and F005. All of these wastes were associated with the production of paints, lacquers, and other coating materials. Wastes were managed in a container storage pad and in four waste management storage tanks. The waste storage pad was a 36-foot by 84-foot outdoor, uncovered paved pad. The maximum design capacity of the pad was 53,000 gallons or approximately 964 drums. The capacity of the four storage tanks ranged from 3,200 gallons to 10,000 gallons. The maximum design capacity of the four carbon steel tanks was 26,000 gallons. The tanks were closed-head and were raised above the floor of the concrete secondary containment dike. DuPont managed dirty wash solvent and still bottoms in the storage tanks. The waste codes associated with these wastes were F003 and F005.

The plant operated under RCRA interim status. A Part A permit application was submitted in January 1983, and a revised Part A permit application was submitted to the Missouri Department of Natural Resources (MDNR) Division of Environmental Quality, Hazardous Waste Section, in June 1988. A Part B permit application was submitted to MDNR in August 1988 but was subsequently withdrawn in 1990, following a decision to cease operations at the DuPont site. All production was halted in September 1990, in preparation for closure of the facility. A RCRA closure plan was submitted to MDNR in August 1991 for closure of the container storage pad and the waste storage tanks. The interim status storage areas were certified closed on July 29, 1994.

CERCLA Determination

The site is designated as deferred to RCRA, and has a final strategy determination indicating no further Superfund interest. This facility is one at which the Superfund program conducted an inspection for EPA's RCRA program during the period from 1990 to 1994. This site is an EPI site, and an EPI/PA report was entered into the CERCLIS database so resources could be tracked. The site has never been the subject of investigation through the EPA Superfund program, except as part of the EPI program. The site was archived in CERCLIS on 6/23/97.

Current Site Status

The non-National Priorities List (NPL) status of this site is "No Further Remedial Action Planned." However, the final RCRA facility assessment (RFA) report addendum from MDNR in September 1996 indicated the need for a RCRA facility investigation (RFI). The RFI workplan prepared for the DuPont site was approved by MDNR on 10/29/98. The RFI has not been completed to date. The DuPont site

appears in RCRIS as a former RCRA treatment, storage and disposal facility (TSDF) subject to post-closure requirements.

Recommendations

Based on this PA2 review and a draft HRS score of 2.1, EPA has determined that no further remedial (pre-remedial site assessment) action is appropriate for the site. Cleanup of the DuPont site is being pursued appropriately under RCRA authority.